

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Richmond Division

UNITED STATES OF AMERICA)	Criminal No. 3:22-cr- <u>122</u>
)	
v.)	Count 1: 18 U.S.C. § 1951(a)
)	(Conspiracy to Commit Robbery Affecting
)	Commerce)
)	
MICHAEL BROWN,)	Count 2: 18 U.S.C. §§ 1951(a) and 2
(Counts One - Four))	(Robbery Affecting Commerce)
)	
RICARDO HORNE,)	Count 3: 18 U.S.C. §§ 924(c)(1)(A)
(Counts One and Two))	(Using, Carrying, and Brandishing a Firearm
)	During and in Relation to a Crime of
and)	Violence)
)	
RASHANDA BOOKER,)	Count 4: 18 U.S.C. § 922(g)(1)
(Counts One and Two))	(Possession of a Firearm by a Convicted
)	Felon)
Defendants.)	
)	
)	
)	Forfeiture Allegation

INDICTMENT

August 2022 Term—at Richmond, Virginia

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment the Dollar General, 3903 Walmsley Boulevard, Richmond, Virginia 23234, referenced herein was a business engaged in receiving and selling goods in interstate commerce in an industry that affects interstate commerce.

COUNT ONE

(Conspiracy to Commit Robbery Affecting Commerce)

On or about April 28, 2022, in the Eastern District of Virginia and elsewhere, the defendants, MICHAEL BROWN, RICARDO HORNE, and RASHANDA BOOKER, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree to obstruct, delay, and affect commerce and the movement of articles and commodities in such commerce, as those terms are defined in Title 18, United States Code, Section 1951, that is, by unlawfully taking and obtaining property consisting of approximately \$910 in United States currency belonging to the Dollar General, 3903 Walmsley Boulevard, Richmond, Virginia 23234, in the presence of employees C.W. and A.E., against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to said employees' persons, that is by brandishing a firearm and demanding from the employees money and other property belonging to the business.

(In violation of Title 18, United States Code, Section 1951).

COUNT TWO

(Robbery Affecting Commerce)

On or about April 28, 2022, in the Eastern District of Virginia and elsewhere, the defendants, MICHAEL BROWN, RICARDO HORNE, and RASHANDA BOOKER, aided, abetted, induced, counseled, and encouraged by one another, did knowingly and unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles in commodities in such commerce, by knowingly and willfully committing robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants HORNE and

BROWN did unlawfully take and obtain property, approximately \$910 in United States Currency, from the person of, and in the presence of, employees C.W. and A.E. of the Dollar General, 3903 Walmsley Boulevard, Richmond, Virginia 23234, a business engaged in interstate commerce, against their will by means of actual and threatened force, violence and fear of injury, immediate and future, to his person, that is, defendant BROWN brandished a firearm inside the Dollar General, 3903 Walmsley Boulevard, Richmond, Virginia 23234, and demanded property as well as money belonging to the business.

(In violation of Title 18, United States Code, Sections 1951(a) and 2).

COUNT THREE

(Using, Carrying, and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about April 28, 2022, in the Eastern District of Virginia, the defendant, MICHAEL BROWN, did knowingly and unlawfully use, carry, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery affecting commerce, as charged in Count Two of this Indictment, which is re-alleged as if fully set forth and incorporated by reference herein.

(In violation of Title 18, United States Code, Sections 924(c)(1)(A)).

COUNT FOUR

(Possession of a Firearm by a Convicted Felon)

On or about April 28, 2022, in the Eastern District of Virginia, the defendant, MICHAEL BROWN, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms and ammunition, to wit: (1) Taurus, Model G3C, 9mm, semiautomatic pistol, bearing serial number ADB964342, that had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

FORFEITURE ALLEGATION

Pursuant to Federal Rule of Criminal Procedure 32.2, the defendants, MICHAEL BROWN, RICARDO HORNE, and RASHANDA BOOKER are notified that upon conviction of any of the offenses alleged in Counts One or Two of this Indictment, the defendants shall forfeit any property, real or personal, which constitutes or is derived from proceeds traceable of the offenses, and all firearms and ammunition involved in or used in the commission of such offenses.

Property subject to forfeiture includes, but is not limited to:

Approximately \$910.00 in United States currency;

Taurus, Model G3C, 9mm, semiautomatic pistol, bearing serial number ADB964342; and all accompanying magazines and ammunition.

The defendant, MICHAEL BROWN is further notified that if he is convicted of any of the offenses alleged in Counts Three or Four of this Indictment, he shall forfeit to the United States, all firearms and ammunition involved in or used in the commission of such offenses.

Property subject to forfeiture includes, but is not limited to:

Taurus, Model G3C, 9mm, semiautomatic pistol, bearing serial number ADB964342; and all accompanying magazines and ammunition.

If the property subject to forfeiture meets the requirements of 21 U.S.C § 853(p), the United States will seek an order forfeiting substitute assets.

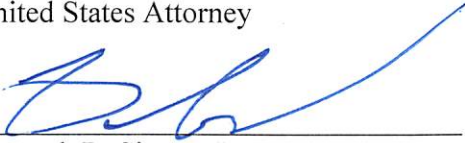
(In accordance with Title 18, United States Code, Section 924; Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p)).

A TRUE BILL:

FOREPERSON

JESSICA D. ABER
United States Attorney

By:


Kenneth R. Simon, Jr.
Jessica L. Wright
Assistant United States Attorneys

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office